

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MULLEN AUTOMOTIVE, INC., HYON CHA,

and SHAYAN KHORRAMI,

Plaintiffs,

- against -

IMC FINANCIAL MARKETS, CLEAR STREET
MARKETS LLC, UBS SECURITIES, LLC, and
John Does 1 THROUGH 10,

Defendants.

Case No. 1:23-cv-10637

Hon. Louis L. Stanton

**DECLARATION OF JAMES W. CHRISTIAN IN
SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

JAMES W. CHRISTIAN, under penalty of perjury, declares the following:

1. I am an attorney at law, admitted to practice before the courts of the State of New York and the Southern District of New York and I am the managing partner in ChristianAttar (“CA”), counsel to plaintiffs Mullen Automotive, Inc. (“Mullen”), Hyon Cha (“Cha”), and Shayan Khorrami (“Khorrami”). Mullen, Cha, and Khorrami are referred to herein collectively as “Plaintiffs”.

2. I submit this declaration in support of CA’s motion pursuant to Local Civil Rule 1.4 for an Order relieving CA as attorneys of record for Plaintiffs on the ground that there has been a breakdown in the attorney-client relationship and that Plaintiffs have sought and retained new counsel.

3. All Plaintiffs have informed me that they consent to the relief sought herein.

4. This is an action against IMC Financial Markets, Clear Street Markets LLC, UBS Securities, LLC, and John Does 1 through 10 for unlawful spoofing schemes and unlawful manipulation of share price.

5. This action was commenced in December of 2023 and is still in the motion to dismiss phase, and the action is not yet on the Court's trial calendar.

6. The clients prefer Kasowitz Benson Torres LLP be the only counsel further prosecuting the case.

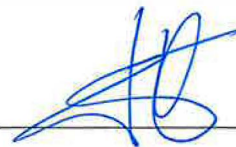
7. As such, Plaintiffs have retained Kasowitz Benson Torres LLP, who made an appearance in this Court on June 12, 2024 as to Mullen Automotive, Inc. and July 17, 2024 as to Shayan Khorami and Hyon Cha. As such, Kasowitz Benson Torres LLP shall be responsible for all matters in the future for all Plaintiffs.

8. Accordingly, CA respectfully requests that its motion to be relieved as attorneys of record for all Plaintiffs to be granted, save and except for the limited jurisdiction of the pending Rule 11 motion.

Dated: New York, New York
July 17, 2024

Respectfully submitted,

By: _____



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Attorney for Plaintiffs